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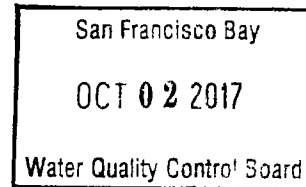
155 SANSOME STREET
SEVENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94104
(415) 402-2700
FAX (415) 398-5630

David M. Ivester
(415) 402-2702
divester@briscoelaw.net

September 29, 2017

BY FEDERAL EXPRESS OVERNIGHT AND EMAIL

Bryan Matsumoto
U.S. Army Corps of Engineers
San Francisco District
1455 Market Street
San Francisco, CA 94103-1398



Re: Dutra Haystack Asphalt Plant Project, Sonoma County, California; Corps PN No. 2003-281040

Dear Mr. Matsumoto:

Enclosed please find a revised Alternatives Analysis for the Dutra Haystack Asphalt Plant Project (dated September 30, 2017; "Alternatives Analysis"), a revised Wetlands Mitigation and Monitoring Plan (September 2017), and a revised Management Plan (September 2017), together with a copy of a letter transmitting these documents to the Regional Water Quality Control Board.

I am pleased to report that through detailed analysis Dutra has determined that it can practicably achieve the overall project purpose with an on-site alternative that would avoid filling 1.32 acres of wetland proposed to be filled under the proposed project. This Reduced Fill Alternative would fill only 0.52 acre of wetland, and it would not result in any other significant adverse environmental consequences. As explained in the Alternatives Analysis, this Reduced Fill Alternative is the least environmentally damaging practicable alternative under the section 404(b)(1) Guidelines.

In light of this determination, Dutra proposes to implement the Reduced Fill Alternative rather than the proposed project, and accordingly asks the Corps to review and approve that alternative.

As the Reduced Fill Alternative would have substantially less impact on wetlands than the proposed project, the measures needed to mitigate those impacts accordingly would be

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substantially less as well. The Reduced Fill Alternative would fill only 0.52 acre of wetland, less than one third the 1.84 acres of wetlands proposed to be filled by the proposed project.

While the reduction of wetland impacts warrants corresponding reduction of mitigation, Dutra nonetheless proposes to provide the same mitigation it had proposed for the proposed project. Dutra has revised the Mitigation and Monitoring Plan to reflect its decision to propose the Reduced Fill Alternative in place of the previously proposed project and otherwise propose substantially the same mitigation measures proposed for the previously proposed project. The proposed mitigation includes creation of 2.66 acres of seasonally inundated wetland, enhancement of 8.21 acres of seasonally inundated wetland, restoration of 0.02 acres of brackish marsh fronting the Petaluma River, reservation of 0.57 acre of seasonally inundated wetland, and enhancement of 3.12 acres of upland buffer. Implementation of this mitigation would mitigate the wetland impacts of the Reduced Fill Alternative at a replacement ratio of 13:1

As mentioned in our recent telephone conference, Dutra anticipates providing responses in the coming weeks to the comments on the Corps' public notice of the project. In the meantime, if you have any questions about the enclosed materials or wish to discuss any aspect of the project, we would welcome hearing from you.

Sincerely yours,

BRISCOE IVESTER & BAZEL LLP



David Ivester

DMI/DMI
Enclosure